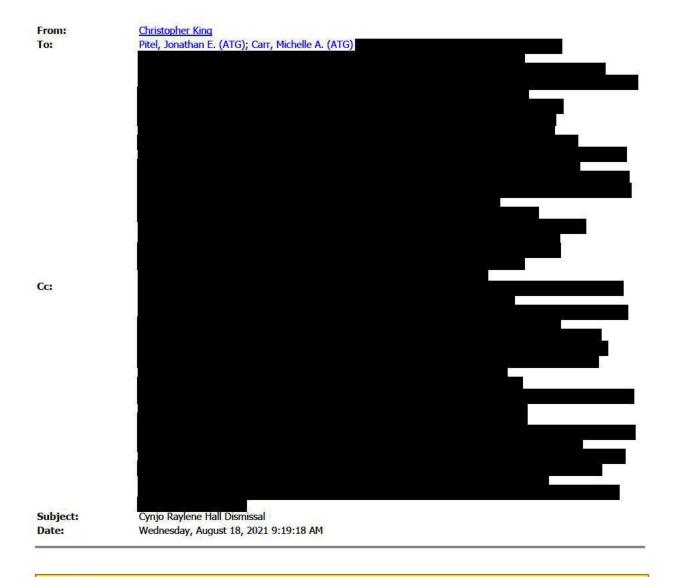
1 2 3 4 The Honorable Richard A. Jones 5 6 UNITED STATES DISTRICT COURT 7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 9 CHRISTOPHER KING, J.D. A/K/A No. 2:20-CV-01494-RAJ 10 KINGCAST, and JOHN NOVAK, **DECLARATION OF** 11 Plaintiffs, JONATHAN E. PITEL IN SUPPORT OF 12 **DEFENDANTS' RESPONSE** v. TO PLAINTIFFS' REQUEST 13 LIQUOR AND CANNABIS BOARD OF FOR PERMISSIVE JOINDER THE STATE OF WASHINGTON; JANE 14 RUSHFORD, Chair of the Liquor and Cannabis Board; RICK GARZA, Director 15 of the Liquor and Cannabis Board; JAY INSLEE, Governor of Washington; 16 ROBERT FERGUSON, Washington Attorney General; WILLIAM P. BARR, 17 U. S. Attornev General: AND OFFICE OF NATIONAL DRUG CONTROL POLICY 18 In their Individual and Official Capacities, 19 20 Defendants. 21 1. I am an Assistant Attorney General in the Licensing and Administrative Law 22 Division of the Office of the Attorney General. In that capacity, I represent Governor Jay Inslee; 23 Attorney General Robert Ferguson; the Liquor and Cannabis Board of the State of Washington; 24 25 Jane Rushford, former Chair of the Liquor and Cannabis Board; and Rick Garza, Director of the 26

1	Liquor and Cannabis Board (State Defendants) in the above captioned case. I am at least 18 years
2	of age, competent to testify as a witness, and have personal knowledge of the facts related in this
3	declaration.
5	2. I make this declaration on the basis of my personal knowledge.
6	3. On August 18, 2021, I received an email from Christopher King, entitled "Cynjo
7	Raylene Hall Dismissal." A redacted copy of that email is attached hereto as Exhibit A . The
8	Exhibit has been redacted only to protect the email addresses of non-parties.
9	4. I declare under penalty of perjury under the laws of the State of Washington that
10	the foregoing is true and correct.
11	
12	DATED this 26 th day of August, 2021.
14	
15	ROBERT W. FERGUSON
16	ATTORNEY GENERAL
17	<u>s/ Jonathan E. Pitel</u> JONATHAN E. PITEL, WSBA # 47516
18	Assistant Attorney General 1125 Washington Street SE
19	PO Box 40110 Olympia, WA 98504
20	Jonathan.pitel@atg.wa.gov LalOlyEF@atg.wa.gov (360) 586-2780
21	
22	Counsel for State Defendants
23 24	
25	
26	

EXHIBIT A



[EXTERNAL]

Dismissed without Prejudice though which is bullshit. Same thing the state did to me in NH – like a Nol-Pross Nolle Prosequi in which they still technically reserve the right to come back and try to wreck your life. I should have known this was the slimy route they would take. Same with Levi. Does wonders for their insurance metrics. I know, remember I've practiced on both sides.

And this way a Jury doesn't get to hear Agent John Jung get grilled, get it? I'm still sharing this comment and development with the Federal Court today you bet. Right after Breakfast.

Ciao.

C

